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UNITED STATES DISTRICT COURT
101 W. LOMBARD STREET
BALTIMORE, MARYLAND 21201-2691

September 25, 2023

Plaintiff : Anthony Quinn Wheeler Jr. Pro Se
1919 Winder Rd
Baltimore MD, 21244

Case Number # 23-cv-01643-LKG

v.

Defendant : Giant Of Maryland LLC
803 Professional Pl #115
Landover, Maryland 20785

Amended Complaint

(Title VII of the Civil Right Act of 1964) and (42 U.S. Code Section 1981)

Employment Discrimination (Race), Wrongful termination and Harassment

Anthony Quinn Wheeler jr (" **Plaintiff** ") is Pro Se, submits this complaint against Giant Of Maryland LLC, (**Defendant**), and seek redness and compensation, for Discrimination's, Harassment's, Wrongful Termination's that pursuant to Md Rule's (§ 5-101- action file within 3 years), and (§ 20-606- Unlawful employment practices), and (§ 3-803-harassment), and (§ 9-501- false statements), and (§ 3-503- deductions), and (§ 3-305- Claim's For Relief). Plaintiff have a (**NRTS**) from the (**EEOC**), of charge number: **531-2023-01671**, towards Section 1981, and Title VII, also (**§1601.28** – Notice Right To Sue).

"This court has subject matter jurisdiction, personal jurisdiction, and venue to hear the complaint ".

The Plaintiff amount sought exceeds more than 75,000.00.

PARTIES

1. Plaintiff is a resident of Windsor Mill, Baltimore County, Maryland.
2. Defendant is a resident of Prince George's County, Baltimore County, Maryland.

JURISDICTION AND VENUE

3. This court has jurisdiction pursuant to **42 U.S. Code § 1981**, and **Title VII**, and MD Rule's **§ 4-401**, and **§ 1601.28**, and **§ 20-606**, and **§ 5-101**, and **§ 3-803**, and **§ 9-501**, and **§ 3-305**, and **§ 3-503**.

4. Venue is appropriate in this court, and on **42 U.S. Code § 1981**, and **Title VII**, and MD Rule's **§ 4-401**, and **§ 1601.28**, and **§ 20-606**, and **§ 5-101**, and **§ 3-803**, and **§ 9-501**, and **§ 3-305**, and **§ 3-503**, because both parties reside in this judicial district, and the alleged action occurred within this district.

The time limitation to file charges

5. The Plaintiff is within legal time, to file a charge, the beginning of the matter happened on data of 04/05/2023, of the job termination at the company of "Giant", which the civil complaint was file within 180 days, on data of **05/10/2023**, for **Title VII**, requirements. The Assault and Battery happen on data 06/15/2021, the expiration date to file a charge is **6/15/2024** for **Section 1981**, requirements, on data **0-5/10/2023** the complaint was file. The Plaintiff amended complaint are file on data of **09/25/2023** for acceptable requirements of **Section 1981** and **Title VII**, within the **Assault and Battery/ Race Hate** crime, and **employment discrimination (Race)** complaint. The entire complaint is file in legal time.

Parties Name and Address's

6. Giant of Maryland LLC, is located at, 8301 Professional Pl #115 Landover, Maryland 20785.

(The store Headquarters where '(Casandra Nitkowski)', the (HR), the Human Resource work at,).

7. Giant Food store located at, 10210 Mill Run Circle, Owings Mills, MD 21117. (It's where the racial conflict of Plaintiff job termination happened at, from the store manager name '(Todd MacPherson)' on data **11/12/2022**, of asking the Plaintiff **identity**/race, to keep a career, then terminated the career).

8. The store union location at, UNITED FOOD & COMMERCIAL WORKERS, 21 West Rd Ste 200, Towson, MD 21204. (It's the store union where '(**Doug Menapace**)', (**rep**) the union **representative** work, and '(**Jessica Hack**)', the supervisor of the union (**rep**) work, which '(**Jessica Hack**)' is the **Assistant To The President Of Giant**, that expressed the final announcements from their store union case investigation closure, stating Plaintiff done nothing wrong, still of the racial termination remained.

9. **The Plaintiff Demographics**

- (A). Gender : Male
- (B). Ethnicity : Black, African American
- (C). National Origin: Unite States Of America
- (D). Age: 39
- (E). year: 08/02/1984
- (F). Born: Baltimore Maryland

10. **The Plaintiff employment / and defendant**

- (A). The Plaintiff worked for Giant industry for approximately near 6 years
- (B). Organization name: Giant
- (C). Type Of Employer: Business
- (D). Number Of Employees: 100 or more
- (E). Address: *10210 Mill Run Circle, Owings Mills, MD 21117*. (Phone # : 410-413-2965)
- (F). Job Termination data: 11/12/2022
- (G). Termination: Discrimination, Harassment, Wrongful Termination

11. **Respondent**

- (A). Organization name : Giant Of Maryland LLC
- (B). Type Of Employer : Business, Headquarters. Filing state: Maryland (MD)
- (C). Number Of Employees : 20,000 or more
- (D). Address: *8301 Professional Pl #115 Landover, Maryland 20785*
- (E). Phone # (301) 341-4100
- (F). Type Of Entity: Maryland Domestic LLC. Listed as Active / File Number# W05378534

I. **GENERAL ALLEGATION OF FACT**

12. **At the beginning**, the occurrence of the **(Defendant)**, Giant Of Maryland LLC, which is located at, 8301 Professional Pl #115 Landover, Maryland 20785, it's the Headquarters of the store **Giant**, that's located at, 10210 Mill Run Circle, Owings Mills, MD 21117, of where I repeatedly spoken to the managers, and the store manager name (**Lisa schepers**), about their employees having hostility towards me, just it was ignored, and start saying it's trouble I'm upon on, Sather than having a meeting.

(A). Violation on turning a blind eye to a hostile work-place environment, causing fights, *see Title VII*.

(B). Violation, discriminating to provide service, *see (Title VII of the Civil Right Act of 1964)*.

13. Moments later, in the store on data 06/15/2021, around 12:15 am Tuesday, the store employee name (**Darian Newman**) done a **Assault and Battery** crime on me. **(Darian)** gotten mad when he heard whatever he didn't want to hear, then threw his fist laying it on the side of my face, on the jar part, scraping tooth to tooth then a tiny chip appeared, just he was calling me black bitches and niggers, doing the restraining him as he was striking, we gotten outside where he was continuing being racial, screaming to fight, for about 20 minutes, then try to crash his car to my empty car in the huge empty store parking-lot, I then made a police report of the crime, the police report number is # **211660079**, J9-Assault, 1st/2nd Degree Workplace. We both was lay off from work while the audio/ video being view

of the investigation, of audio recorded at the front door, of the store, of where he was meanly screaming at, just (**Darian**) was still coming to work in the store as a vendor, while doing the approximately 4 weeks investigation of the crime and racial act. The end result was (**Darian Newman**) being directly terminated and abandoned from the company and property, just the store union assisted (**Darian**) to still work in the store, then right next to me again shoulder to shoulder as a vendor, with **100% full regular employee authorities**, doing my return back after his termination/crime which he never left from. Then he harass, stalk, being racial again, having staff slurs manipulating our all black uniform's from his racial slur's. The chip tooth fracture expanded in a single tooth, which later got infected.

(A). Violation, assisting (**Darian**) to being racial at work-place, causing hostilities, *see Title VII*.

(B). Violation on allowing a racial act take enjoyment of life, *see Section 1981*, and *discrimination*.

14. Moments later, the store managers start cuddling around (**Darian Newman**), after his crime, then tamper with my back-pay from being off doing the investigation, which I didn't receive the income for approximately 13 weeks, when it was suppose to be on my next week pay-check or two, of my return back to work, and when I received the income it was 40 plus hours missing, and no one wanted to fix it.

(A). Violation, refuse to pay back-pay and causing hostile in work-place environment, *see Title VII*.

(B). Violation on causing hostilities from negligence to pay, *see § 20-606*, and *§ 3-503- deductions*.

15. Moments later, the store manager name (**Lisa schepers**) that originally accepted (**Darian Newman**) back in the store after the (**Race Hate Crime**), she start placing false disciplinary reports on me, one from not doing 150 boxes in ten minutes left of leaving hours, with her screaming my name on the store microphone to do the isle, **so the outside public can hear her**, from the speakers outside. The other scene was stating I'm am/ not wearing my face mask properly, when I was the only one wearing the face mask on night crew the entire Covid -19 pandemic, and it was on properly when she

saw me, as I was next to the BANK in the store, in-front of the cameras. I reported all interruptions from that lady and eventually expectedly **she gotten put out**, and a new store manager took her spot, his name is **(Todd MacPherson)**, and he was upset and mad, with a behavior aiming for retaliation's.

(A). Violation on hostilities, making a hostile working environment from **(Darian)**, *see Title VII*.

(B). Violation on directly assisting a racial act in the company, *see Section 3-803*, and *Section 1981*.

16. Moments later, at the defendant location I worked at on data **11/11/2022 on a Friday morning**, when I call up to the store speaking of my two days off work, of I couldn't make it to the store, then the store manager name **(Todd MacPherson)** kept hanging up the phone in the important conversation, while I was politely talking to him **the entire time**, as he just kept threatening my job, yelling towards being fired, which that's how he prevent communication, and my 5 (ph) personal hours, of my personal belongings to substitute the lost time off, which I was force to talk to a other manager in the same store of a different authority, about my important concerns, and of why I was off work for two days, which when I was told to return back to work that same day on Friday data 11/11/2022, to clock-in at midnight, to work Saturday data **11/12/2022 morning**, schedule (12:00am to 8:00am), of my normal schedule, which when a nasty situation occurred from **(Todd MacPherson)**, doing on data **11/12/2022 Saturday morning around 6:00 am** in his office, as I was standing in the open doorway, when we return back to work, after his impolite phone conversation standard's with me, on data **11/11/2022 morning**.

(A). Violation towards office misconduct causing hostilities from yelling on the phone, *see Title VII*.

(B). Violation, assisting a racial from **(Darian)**, by **(Todd)** rude phone screaming, *see Section 1981*.

17. **On data 11/12/2022 around 6:00 am** **(Todd MacPherson)** came in the store, walked pass me, and a lady that's in his same race in the storage area near his office, talking about the water jogs, as we was standing 10 feet near his office. I waited about 5 minutes so **(Todd MacPherson)** can get settle

in his office. I then went to his office door, I was asking for respect when I saw him, by saying "don't be hanging up the phone on me while I'm talking to you". (**Todd MacPherson**) then **respectfully said he didn't**, I then said "you done it two times", then (**Todd MacPherson**) fast screamed a very loud tone **yelling** "Who the fuck are you, coming in my office telling me what to do". Then I politely said "watch it man", then before I was about to say anything else, as I pause for about 3 seconds, then (**Todd MacPherson**) gotten frighten/anxious, as I'm thinking what identity information he want, surrounded in the rude race hostilities from the **Race Hate crime/fight**, they assisting, then he fast screamed "you threatening me, I'm calling the police". I then said "watch it man", then I appropriately ended the rude conversation, simply by walked away from his office doorway. **I left the store early around (6:17am)**, of the time I told to the (night crew team caption/ night manager) around (3:00am), because I had **tooth pain**, when the original schedule was set for **(12:00am to 8:00am)**, of the store manager only knew of.

(A). Violation, company hostilities to prevent 5 (PH) personal hours, do to race, *see Md Rule § 20-606*.

(B). Violation, asking for identity/race to be cooperative to work with, *see Title VII*, and *Section 1981*.

18. I came to work that same night, on Saturday to clock-in for Sunday, at **12:00 am** at night, then I was told I can't work because the County Police Department came to the store looking for me, do to a threat on (**Todd MacPherson**). I then ask to use the store phone and I called the store union rep name (**Doug Menapace**), and I explained **the entire situation**, on his phone answering machine, then I left.

(A). Violation, making a false police report, **of knowing its false**, to cause harm, *see Md Rule § 9-501*.

(B). Violation, on racial hostilities, *see Title VII, Section 1981*, and *MD Rule § 20-606*, and *§ 3-803*.

19. **I kept in touch with the store union**, and the union phone secretary categorize my position as a **suspension**, because I wasn't giving any notification papers, not even from the (night crew team caption) or any manager's that night. (**Todd MacPherson**) **self verbally abuse the company policies**.

(A). Violation towards causing hostilities in the company, *see* Section 20-606, and Title VII.

(B). Violation, (Todd) telling police Plaintiff didn't kept in contact with the store union, *see* § 9-501.

20. Later within that week, when the union rep (Doug Menapace) call me back towards the call at the store, of Saturday night on data **11/12/2022**, from the statement the (night crew team captain) told me, and **of the entire scenery of the conflict I stated on "his/ company" phone answering machine**, the union rep name (Doug Menapace) only said, the store manager (Todd MacPherson) said **I called up to the store threatening his life with using profanity**, and that's the reason of my termination. Then I was told by (Doug Menapace) that the store union going do their **investigation**, which a few days later I was giving a call from (Doug Menapace), stating towards a meeting with him and the store union private (HR) Human Resource worker, name (Casandra Nitkowski).

(A). Violation, causing hostilities in working environment/ false disciplinary reports, *see* Title VII.

(B). Violation, (Todd MacPherson) telling a false and different report to the police, *see* Section 9-501.

21. Doing the meeting with (Doug Menapace), and (Casandra Nitkowski), it went great, we then start to joking, then talking about college. (Doug Menapace) phone call me a few days after the meeting we all had, and left a voicemail message on my phone, stating " I'm going back to work with the full back-pay, and for me to call him ", and when we talked he said **I might** have to be transfer, which when I said if that's the mighty last option then ok, **I'm willing to be transfer**, then I requested to speak to the human resource worker that was in our meeting, name (Casandra Nitkowski).

(A). Violation, the store union going against the innocent to satisfy the guilty racial, *see* Section 1981.

(B). Violation, penalizing innocent in a protected activity of reporting a racial act, *see* Title VII.

22. I was ask to call (Casandra Nitkowski) phone number, from (Doug Menapace) asking her

permission, and when I was talking to (Casandra Nitkowski) on her private time, she asked me "do I agree to being transfer", I said "no", then I was explaining why I don't agree it should be me, when then (Casandra Nitkowski) cuts me off and said the store don't view the cameras or audio's, and it don't label as a forgery making a false police report, as I said " it does ", then she said "ok" I be calling you back". (Casandra Nitkowski) then call the union rep (Doug Menapace) back that day saying a lie, that I was aggressive to her, and that I said I'm drinking, and I was threatening her life using profanity. Which then (Casandra Nitkowski) terminated me from my career, which was only do to a lie. Which then (Doug Menapace) then call my phone and left a depressing phone message on my phone answering machine, stating towards my career termination from (Casandra Nitkowski).

(A). Violation, the (HR) name (Casandra) in retaliation, for placing in a complaint, *see Title VII*.

(B). Violation, the (HR) assisting a racial act of (Todd), for Plaintiff job termination, *see Section 1981*.

23. I reported (Casandra) was in retaliation positions, because I done a complaint, just no one cared.

(A). Violation, defendant in retaliation, and done improper investigation for termination, *see Title VII*.

(B). Violation, making complications for placing in a complaint of a racial matter, *see Section 1981*.

24. At the end, after all issues were finalize from data of 11/12/2022, of the job termination of my career, and I had file a report in The Equal Employment Opportunity Commission, the (EEOC) portal, on data 02/16/2023, ending of stating the complaint, then the store of "Giant", store union, gotten in contact with me, and assign me in a virtual April Lee Grievance meeting over the phone, **that I only audio join**, which we had the meeting on data of 02/28/2023, where the Store Union confessed **they in wrong**. The union rep stated a store manager can make up a scenery to remove someone, the (HR) confessed she didn't state our conversation of how it was, the Assistant To The President Of

Giant admits I done **nothing wrong nor inappropriate**, and the union want me to have my job, with the full back-pay and benefits. I was then told to pick a location to be transfer at, and wait for a call within 7 to **10** days, which never happened. I waited about 5 days after the **10** days to wait and texted (**Doug Menapace**), and he text me back in 5 minutes stating my job been denial, and he to busy to talk.

(A). Violation, in assisting in employment discrimination (Race) termination, *see* **Section 1981**.

(B). Violation, hostilities for placing in a complaint, *see* **Title VII of the Civil Right Act of 1964**.

25. The defendant being involvement with each other, and made a disadvantage only because my race is different from theirs, from (**Todd MacPherson**) dispute, because there's no other explanation of termination, after expressing **I'm the only one innocent**, and the standards we was sitting on was only on a racial standard from the store manager in the company, that wrongful terminated me, do to a race dispute, as the union rep is a **white man**, the union rep supervisor is a **white lady**, that was speaking for the store manager that is a **white man**, that was supporting the former store manager that is a **white lady**, the director of the meeting is a **white man**, the former union rep is a **white man**, as I'm the only **Black** African American man in the meeting, of the defendant top authorize holders explaining to me that I'm innocent, just they support the guilty side of their race, and penalize me, **doing a race dispute**. The Assistant To The President Of Giant announcement was from within all their prep/meetings, which it made the announcements that I done nothing wrong nor inappropriate, just my termination still was remained. I was giving 2 job termination letter, dated before and date after the meeting **of the same act**.

(A). Violation, assisting in a racial act of employment discrimination (Race), *see* **Section 1981**.

(B). Violation on hostilities, as the Plaintiff was pull in a private meeting with history, *see* **Title VII**.

26. Just within all from the EEOC, the Plaintiff was giving the Charge Of Discrimination, to place on the defendant, which was giving on data **06/20/2023**, and a (**NRTS**) **Notice Right To Sue, from the**

EEOC was giving on data 07/05/2023, which supports towards Title VII, and Section 1981, of a Protected Class requirements, and to state a visual claim towards the case.

II. The Counts, of the GENERAL ALLEGATION OF FACT

Count One: Discrimination:

1. The Plaintiff incorporates by references the facts alleged in paragraph 1-26.

27. The Defendant discrimination's was the direct and proximate result of the Plaintiff job termination, from not allowing the Plaintiff to the company safety and health policies, by allowing a former employee to re-enter the store after doing a Race Hate Crime, to stalk, harass, and to be racial on the Plaintiff in their store. The discrimination also came from accepting (Todd MacPherson) to remain at the store location and to remove the Plaintiff, after breaking the law from doing a false Baltimore County Police Department Report, of a threat, just the plaintiff couldn't have any peace of space, when a real threat and Assault and Battery happened within a Race Hate Crime. The discrimination also occurred from the store private (HR), supporting the store manager racial act, and in a False Police Report of a threat, then to making her own false documents to incriminate the Plaintiff which led to the Plaintiff job termination also. The discrimination also came from the store union supporting the store manager racial act and crime, and at the April Lee Grievance meeting when acknowledged the store manager in wrong, then the store union penalized the Plaintiff that they even admitted to that done nothing wrong, nor inappropriate, to stabilize a individual in their race, which (Todd MacPherson) broken the state laws, company polities, and the Plaintiff civil rights. That's illegal *see under* Section 1981 and Title VII, *for allowing a racial act to take the enjoyment out of the Plaintiff life. The Defendant are aware of the* Assault and Battery, *by (Darian Newman) in the store, with his racial screams, and then outside at the front of the store have audio and video footage, capturing (Darian)*

yelling at the Plaintiff screaming **black bitches and niggers**, as the Plaintiff only saying lets be just be friends, as (**Darian**) screaming fuck you, while putting his two fist up, repeatedly being racial and saying threats, ending with getting in his car speeding to my car, then yank fast turned inches away from crashing into my car, in the empty store parking-lot, not knowing who was in or on their way coming out, then the defendant allowed him to work next to me. Then to (**Todd**) screaming **who the fuck are you, to keep a career**, then terminate my career directly of that identity question.

Count Two: Harassment:

2. The Plaintiff incorporates by references the facts alleged in paragraph 1-26.

28. The Defendant harassment's was the direct and proximate result of the Plaintiff job termination, from the defendant creating hostilities from accepting a abandon employee name (**Darian Newman**) that done a **Race Hate Crime** on the Plaintiff, to re-enter to stalk, and harass with being racial to the Plaintiff in the work-place, into the Plaintiff gotten terminated. The harass also came from the store manager name (**Todd MacPherson**) pure being racial, careless and rude, by asking the Plaintiff for a identity to be cooperate with, then job terminated the Plaintiff directly from the identity question, then the same manager done a Phone Harassment, by making a false police report, to the **Baltimore County Police Department**. The Plaintiff was harass to fight the guy that done the **Assault and Battery**, and the Plaintiff was harass to fight the store manager, from their violent hostilities and actions **provoking a violent response, constantly**. The harassment also came from the defendant had no desire into reinstatement's at the April Lee Grievance meeting, when they kept exhausting contacting me, which is direct harassment from keep being annoying, by stating towards they know I did nothing wrong nor inappropriate, just that I still lose my career from the store manager racial act and crime, and the store private (**HR**) confessions of she was dishonest, that caused my job termination

also, that was assisting a racial act of (**Todd**), which he was assisting a racial confusion from (**Darian**). The defendant assisted (**Darian**) comedian racial acts slurs, they deliberately made every black word from them became awkward intentionally, from comprehensible illegal motives, *see Section 1981*.

Count Three: Wrongful Termination's:

3. The Plaintiff incorporates by references the facts alleged in paragraph 1-26.

29. I engaged in a protected activity, and I was terminated in retaliation for **engaging in the protected activity** under Title VII and Section 1981, of reporting a unsafe working environment, first from the Assault and Battery from (**Darian Newman**), to (**Lisa schepers**) harassment's and false disciplinary reports, then (**Todd**) identity question job termination I reported, within the store (**HR**) false reports, and it's the direct and proximate result of the **Plaintiff job termination's**. Then the store union knows the Plaintiff in the (**EEOC**), and done nothing wrong, just still won't let me finish my career, that was took away **do to only a racial act**, and a retaliation position's, that the store union also admits the store manager is in wrong of, and the store (**HR**) admits she was wrong doing. The defendant participated into a race discrimination, and also to stop my yearly hourly income raises/ promotions, and a largely income back-pay, that raises doing the actions of being off, from (**Todd MacPherson**) racial confusion of the **investigation**. The store union racial acted only to prevent enjoyment in life. *see Section 1981*.

Count four: 42 U.S. Code Section 1981:

4. The Plaintiff incorporates by references the facts alleged in paragraph 1-26.

30. The Defendant allowed a racial act to take the enjoyment out of life, after knowledge the Plaintiff being in a Assault and Battery crime, by (**Darian Newman**) with the guy being racial screaming **black**

bitches and **niggers**, then to assisted him in the work-place to stalk, harass and to be racial causing hostilities into the Plaintiff career termination occurred. Then to the store manager (**Todd**) assisting (**Darian**) racial act in the company, by allowing him there, then to yelling for a identity to be cooperative with, then terminated the Plaintiff career do to a identity question. The store union at the April Lee meeting knows of all the racial act's, and admitted they in wrong, then assisted the racial and penalize the Plaintiff of innocent status, the final termination letter was mail on data of 04/05/2023.

Count five: Title VII of the Civil Right Act of 1964:

5. The Plaintiff incorporates by references the facts alleged in paragraph 1-26.

31. The defendant allowed a racial act to enter in the company, assisted the racial act's and penalize the Plaintiff. The defendant also allowed fraudulent files to stay in the Plaintiff record after admitting it's untrue. The defendant penalized the Plaintiff for participating into a investigation under Title VII law.

III.

I. CLAIM FOR RELIEF

Discrimination

1. According to Rule 3-305- Claim's For Relief, towards Discrimination, the Plaintiff hereby incorporates the proceeding and pursuant to Md Rule code and title, **Md Rule § 20-606**, and (**42 U.S. Code Section 1981**), and (**Title VII of the Civil Right Act of 1964**), in towards **Discrimination**, and the Plaintiff seek redness and compensation, **towards the crime position, as states as follows:**

2. On data 06/20/2023, the Plaintiff sign the digital form of the **EEOC**, of **charge of Discrimination** file on the defendant, and of data 07/05/2023, the Plaintiff was giving a **Notice Right To Sue** letter from **the EEOC**, of charge number: **531-2023-01671**, assigned towards the defendant, which

supports the Plaintiff in a protected class, and in being a Black African American male.

3. The **(Defendant)**, Giant Of Maryland LLC, which is located at, 8301 Professional Pl #115 Landover, Maryland 20785, it's the Headquarters of the store **Giant, location at 10210 Mill Run Circle, Owings Mills, MD 21117**, of where the crime's happen at, from the defendant employees, within the **Assault and Battery** on data 06/15/2021, and my wrongful termination on data 11/12/2022.
4. The Plaintiff worked for Giant for approximately 6 year's, which ended at the job location of **10210 Mill Run Circle, Owings Mills, MD 21117**, within the **Assault and Battery on data 06/15/2021 around 12:15 am**, by **(Darian Newman)** that was punching the Plaintiff while screaming black bitches and niggers, and the company accepting **(Darian Newman)** back in the same store of police report number # 211660079, J9- Assault, 1st/2nd Degree Workplace, to finish harassing and being racial to the Plaintiff after of his termination and abandon penalties. Next, the discrimination came from the store manager name **(Todd MacPherson)** violating Title VII, causing hostilities, from keep hanging up the phone in a important business phone conversation, on data 11/11/2022, then to the next day responding to the Plaintiff saying " WHO THE FUCK IS YOU", Which states towards a **identity**, of race, gender, religious, ancestors, and family back-round, of the direct definition of **WHO IS YOU**, then terminated the Plaintiff **directly in the identity question**. Then to the store private **(HR)** name **(Casandra Nitkowski)**, misleading the Plaintiff of the state law and company policies, with placing in false documents under the Plaintiff identification which caused the Plaintiff termination, that **(Casandra Nitkowski)** confessed she was dishonest on that report while at the April Lee meeting, with the store union confessing also, the Plaintiff done nothing wrong nor inappropriate, just then remained the termination of the plaintiff within the racial **standard**. Which by **(Todd MacPherson)** false police report number of # 223160531, it supports wrongful termination and it's a charges as misdemeanor or a felony, and it's consider as obstruction of justice do to dishonesty. The plaintiff was fired because not

violating by answering a racial question, and not conducting it's self into the interaction, which the Plaintiff was fired for exercising a legal right duty, protected under Title VII, by maintaining polite and walking away doing rude actions, and reporting hostile work-place environment. The company safety polices was applied for (Todd MacPherson) for a false police report and a threat, nothing for Plaintiff.

5. II. " The Plaintiff Sufficient Facts To State A Visible Claim, of Violations in Baltimore MD".

6. It was allowed (**Darian**) to attack, bully, and be racial in the work-place, it's a violation, *see Section 1981* and *Title VII*, *that led to my Termination's*. This crime and position was motivated by desire, because I stated a complaint of awareness, before and after the crime, just it was repeatedly ignored, within allowing (**Darian**) to still participate in the store, to allow a racial act continuously take enjoyment out of life, it's a violation, *see 42 U.S.C. § 2000e-3*, MD Rule *§ 20-606(f)*, and *§ 3-803*.

7. (**Todd**) made a false police report, **knowing its false**, to create career termination's, it's a violation in MD Rule's, *see § 9-501*, and *Title VII, Section 1981*, taking enjoyment of life. I was treated different do to my race, by asking who am I, in that giving identity question context, violation in Discrimination.

8. The April Lee meeting is my witness, **its recorded**, of at knowledge of wrongful termination's, at racial act's, of Assault and Battery using racial terms, to asking for a identity to keep a career, which in violates *42 U.S.C. § 2000e-3*, and *Md. Code, State Gov't § 20-606(f)*, and, *Section 1981*, and *Title VII*. Which all of the Plaintiff union reps attended the meeting, supported I did nothing wrong nor impolite.

9. The Store Union (**HR**) (**Casandra Nitkowski**), done a retaliation/reprisal position, for placing in a complaint, and for participating into a investigation, which is a violation, *see Title VII of the Civil Right Act of 1964*, she join into a racial act assisting (**Todd MacPherson**) racial actions, *see Section 1981*, of *a racial act*, which violated neutral polities in the state, and under harassmment's, and discrimination.

10. The Plaintiff witness is the defendant, of the April Lee meeting. I directly stated the staff was racial, the union supported my innocents then fired me. The audio record is for proof of their prep meeting that made the statements of the Assistant To The President Of Giant, to express I'm innocent, and see Section 1981, a racial act taking enjoyment of life. see MD Rule's § 20-606, and § 9-501.

11. The Defendant fail to not be racial/discriminate and violate Title VII, and Section 1981.

12. **III. Damages**

13. The damages the defendant created was lost of tooth from the Assault and Battery, that had to be surgery removed on data 03/23/2023. I lost of career, the union refuse to erase defective fraudulent files, the Plaintiff reputation is damage in the work fields do to back-round checks, the Plaintiff was giving a false police report record, the defendant illegally prevented the Plaintiff from being on the public area, and for jobs in that area, to live civilize, the defendant prevented the Plaintiff from paying bills and made family complications, within harass, race discriminated, and wrongful termination's.

14. Because the Defendant action's were malicious, fraudulent, egregious, and deliberately in bad faith and in total disregard for the rights of the Plaintiff, and towards Civil rights/ Md rules and codes, of breaking the law, within race discrimination, harassment, wrongful terminations, to the **Section 1981** and **Title VII**, the Plaintiff is entitled to an award of punitive damages.

Wherefore The Plaintiff amount sought exceeds more than 75,000,00.

_____.

"Todd MacPherson False Police Report"

_____.

Narrative

_____.

Ofc. Whitmore #6462 11/13/2022 1230 hours

On 11/11/2022 at approximately 0630 hours, Ofc. Whitmore was dispatched to the Giant foods located at 10200 Mill Run Cir, Owings Mill, MD 21117 in reference to a threat.

Upon arrival, Ofc. Whitmore met with Complainant Todd MacPherson. Complainant MacPherson Advised that on 11/11/2022 he

contact one of his employees, Mr. Anthony Wheeler Jr. about him not showing up for work notice. Complainant MacPherson stated Mr. Wheeler said he called, but nobody answered so it wasn't his problem. Complainant MacPherson told Mr. Wheeler that he still needed to get ahold or show up to notify someone to tell them of his absence. Complaint MacPherson stated Mr. Wheeler became irate and began to insult him. Complainant MacPherson advised he hung up on Mr.

On 11/12/2022 at approximately 0615 hours, Mr. Wheeler entered Complainant MacPherson's office in the back storage area aggressively and stated "Don't hang up motherfucker, I'll kill you, I'll get you outside or in the bathroom.". Complainant MacPherson stated to Mr. Wheeler "Don't you come in here and threaten me". Mr. Wheeler said to the Complainant MacPherson "I'll get you that's a fact". Mr. Wheeler left the store shortly after. Complainant MacPherson advised he is relatively new to the store and has not had issues with Mr. Wheeler prior to this incident. Complainant MacPherson stated Mr. Wheeler is terminated after this incident and wants him trespasses. It is unknow if Mr. Wheeler is aware of his termination.

Interviewee Johnny Green advised he has worked with Mr. Wheeler for awhile and he has an abrasive personality. Interviewee Green stated Mr. Wheeler is antagonistic or combative and to deal with him is to not engage with him. Interviewee Green stated Mr. Wheeler has had issues with other employees in the past, but believes he'll never "throw the first punch" so he can play the victim.

Ofc. Whitmore attempted to make contact with Mr. Wheeler with Provided phone numbers, but the number could be disconnected and or not in service. Contact yielded negative results.

Ofc. Whitmore explained protection order procedures and advised if Mr. Wheeler is in area that he can call police.

BWC available

Sgt. J. Fitch #5043 11/15/22 1306

On 11/15/22, this Sergeant reached out to Mr. MacPherson in reference to the above incident. He advised that subject has self terminated by not showing up for any of his shifts, or calling since the incident. Mr. MacPherson Advised that he has not made any threats contacted him or anyone else at the store to his knowledge. Threat Management's information was provided and he was advised to call if anything changed within the situation. No further.

IV.

I. CLAIM FOR RELIEF

Wrongful Termination

1. According to Rule 3-305 - Claim's For Relief, towards Wrongful Termination, the Plaintiff hereby incorporates the proceeding and pursuant to Md Rule code and title, **Md Rule § 5-101**, and **§ 20-606**, and **§ 9-501- false statements**, and **(42 U.S. Code Section 1981)**, and **(Title VII of the Civil Right Act of 1964)**, and the Plaintiff seek redness and compensation, as states as follows:
2. On data 06/20/2023 the Plaintiff sign the digital form of the EEOC, of **charge of Discrimination** file on the defendant, and of data 07/05/2023 the Plaintiff was giving a **Notice Right To Sue** letter from the EEOC, of charge number: **531-2023-01671**, assigned towards the defendant, which supports the Plaintiff in a protected class, and in being a Black African American male.
3. The **(Defendant)**, Giant Of Maryland LLC, which is located at, 8301 Professional Pl #115 Landover, Maryland 20785, it's the Headquarters of the store **Giant**, location at 10210 Mill Run Circle, Owings Mills, MD 21117, where the manager racial acted, and the Race Hate Crime happen at.
4. The Plaintiff worked for Giant for approximately 6 year's, which ended at the job location of 10210 Mill Run Circle, Owings Mills, MD 21117, within the **Assault and Battery** on data 06/15/2021 around 12:15 am, by **(Darian Newman)** that was punching the Plaintiff while screaming black bitches and niggers, and the company accepting **(Darian Newman)** back in the same store of police report number # 211660079, J9- Assault, 1st/2nd Degree Workplace, to finish harassing and being racial to the Plaintiff after of his termination and abandon penalties. Next, the discrimination came from the store manager name **(Todd MacPherson)** violating Title VII, causing hostilities from keep hanging up the phone, in a important business phone conversation, on data 11/11/2022, then to the next day responding

to the Plaintiff saying “ WHO THE FUCK IS YOU”, Which states towards a **identity**, of race, gender, religious, ancestors, and family back-round, of the direct definition of **WHO IS YOU**, then terminated the Plaintiff **directly in the identity question**. Then to the store private (HR) name (**Casandra Nitkowski**) misleading the Plaintiff of the state law and company policies, with placing in false documents under the Plaintiff identification which caused the Plaintiff termination, that (**Casandra Nitkowski**) confessed she was dishonest on that placement at the April Lee meeting, with the store union confessing also, the Plaintiff done nothing wrong nor inappropriate, just then remained the termination of the plaintiff within the racial **standard**. Which by (**Todd MacPherson**) false police report number of # 223160531, it supports wrongful termination and it's a charges as misdemeanor or a felony, and it's consider as obstruction of justice do to dishonesty. The plaintiff was fired because not violating by answering a racial question, and not conducting it's self into the interaction, which the Plaintiff was fired for exercising a legal right duty, protected under Title VII, by maintaining polite and walking away doing rude actions, and reporting hostile work-place environment. The company safety polices was applied for (Todd MacPherson) for a false police report and a threat, nothing for Plaintiff.

5. II. “ The Plaintiff Sufficient Facts To State A Visible Claim, of Violations in Baltimore MD”.

6. It was allowed (**Darian**) to attack, bully, and be racial in the work-place, it's is a violation, *see Section 1981* and *Title VII*, *that led to my Termination's*. The defendant violated, because I stated a complaint of awareness, before and after the crime, just it was repeatedly ignored, to allow a racial act take enjoyment out of life, which is a violation in public policy, under Title VII, and in Baltimore MD.
7. The defendant accepted (**Todd MacPherson**) to terminate my career do to my identity, and to make a false police report, when both **knowing it's false**, which makes it illegal, in hostilities, to make career termination's, *see MD Rule's § 20-606*, and *§ 9-501*, and *Title VII*, and *Section 1981*, from racial input.

8. The defendant of the April Lee Grievance meeting have acknowledgments of the confessions of the wrongful terminations, that was do to a racial act, and still penalize the Plaintiff, *see* Section 1981, of *taking enjoyment out of life*, and Title VII. *The violation's in State Law within discrimination (Race)*.

9. The Store Union (HR) (Casandra), done a retaliation position of job terminating the Plaintiff, for placed in a complaint of a racial act, which is a violation, *see* Section 1981, and 42 U.S.C § 2000e-3, and Md Rule § 20-606 (f), which occurred doing engaging in the protected activity in Title VII.

10. The Plaintiff witness is the defendant, of the April Lee meeting, of their prep meeting that made the **announcement's** from the Assistant To The President Of Giant, to express the defendant is guilty and the Plaintiff innocent, which supports its a violation in discrimination, *see* Section 1981, a racial act taking enjoyment. *see MD Rule's § 20-606, § 3-803, § 9-501*. The audio record statements is for proof.

11. The Defendant fail to not be racial/discriminate and violate Title VII, and Section 1981.

12. **III. Damages**

13. The damages the defendant created was lost of tooth from the Assault and Battery, that had to be surgery removed on data 03/23/2023. I lost of career, the union refuse to erase defective fraudulent files, the Plaintiff reputation is damage in the work fields do to back-round checks, the Plaintiff was giving a false police report record, the defendant illegally prevented the Plaintiff from being on the public area, and for jobs in that area, to live civilize, the defendant prevented the Plaintiff from paying bills and made family complications, within harass, race discriminated, and wrongful termination's.

14. Because the Defendant action's were malicious, fraudulent, egregious, and deliberately in bad faith and in total disregard for the rights of the Plaintiff, and towards Civil rights/ Md rules and codes, of breaking the law, within race discrimination, harassment, wrongful terminations, to the Section 1981

and **Title VII**, the Plaintiff is entitled to an award of punitive damages.

Wherefore The Plaintiff amount sought exceeds more than 75,000,00.

“Todd MacPherson False Police Report”

Narrative

Ofc. Whitmore #6462 11/13/2022 1230 hours

On 11/11/2022 at approximately 0630 hours, Ofc. Whitmore was dispatched to the Giant foods located at 10200 Mill Run Cir, Owings Mill, MD 21117 in reference to a threat.

Upon arrival, Ofc. Whitmore met with Complainant Todd MacPherson. Complainant MacPherson Advised that on 11/11/2022 he

contact one of his employees, Mr. Anthony Wheeler Jr. about him not showing up for work notice. Complainant MacPherson stated Mr. Wheeler said he called, but nobody answered so it wasn't his problem. Complainant MacPherson told Mr. Wheeler that he still needed to get ahold or show up to notify someone to tell them of his absence. Complaint MacPherson stated Mr. Wheeler became irate and began to insult him. Complainant MacPherson advised he hung up on Mr.

On 11/12/2022 at approximately 0615 hours, Mr. Wheeler entered Complainant MacPherson's office in the back storage area aggressively and stated "Don't hang up motherfucker, I'll kill you, I'll get you outside or in the bathroom.". Complainant MacPherson stated to Mr. Wheeler "Don't you come in here and threaten me". Mr. Wheeler said to the Complainant MacPherson "I'll get you that's a fact". Mr. Wheeler left the store shortly after. Complainant MacPherson advised he is relatively new to the store and has not had issues with Mr. Wheeler prior to this incident. Complainant MacPherson stated Mr. Wheeler is terminated after this incident and wants him trespassed. It is unknow if Mr. Wheeler is aware of his termination.

Interviewee Johnny Green advised he has worked with Mr. Wheeler for awhile and he has an abrasive personality. Interviewee Green stated Mr. Wheeler is antagonistic or combative and to deal with him is to not engage with him. Interviewee Green stated Mr. Wheeler has had issues with other employees in the past, but believes he'll never "throw the first punch" so he can play the victim.

Ofc. Whitmore attempted to make contact with Mr. Wheeler with Provided phone numbers, but the number could be disconnected and or not in service. Contact yielded negative results.

Ofc. Whitmore explained protection order procedures and advised if Mr. Wheeler is in area that he can

call police.

BWC available

Sgt. J. Fitch #5043 11/15/22 1306

On 11/15/22, this Sergeant reached out to Mr. MacPherson in reference to the above incident. He advised that subject has self terminated by not showing up for any of his shifts, or calling since the incident. Mr. MacPherson Advised that he has not made any threats contacted him or anyone else at the store to his knowledge. Threat Management's information was provided and he was advised to call if anything changed within the situation. No further.

V.

I. CLAIM FOR RELIEF

Harassment

1. According to Rule 3-305- Claim's For Relief, towards Section 3-803-Harassment, the Plaintiff hereby incorporates the proceeding and pursuant to Md Rule code and title, Section 9-501- false statements, and § 20-606. Unlawful employment practices, and (42 U.S. Code Section 1981), and (Title VII of the Civil Right Act of 1964), and seek redness and compensation, as states as follows:

2. On data 06/20/2023 the Plaintiff sign the digital form of the **EEOC**, of **charge of Discrimination** file on the defendant, and of data 07/05/2023 the Plaintiff was giving a Notice Right To Sue letter from the **EEOC**, of charge number: **531-2023-01671**, assigned towards the defendant, which supports the Plaintiff in a protected class, and in being a Black African American male.

3. The **(Defendant)**, Giant Of Maryland LLC, which is located at, 8301 Professional Pl #115 Landover, Maryland 20785, it's the Headquarters of the store **Giant**, location at 10210 Mill Run Circle, Owings Mills, MD 21117, where the wrongful termination's by (Todd MacPherson), happened at, from his racial identity question to maintain a career, and where the Assault and Battery happen at.

4. The Plaintiff worked for Giant for approximately 6 year's, which ended at the job location of 10210 Mill Run Circle, Owings Mills, MD 21117, within the Assault and Battery on data 06/15/2021 around 12:15 am, by (**Darian Newman**) that was punching the Plaintiff while screaming black bitches and niggers, and the company accepting (**Darian Newman**) back in the same store of police report number # 211660079, J9- Assault, 1st/2nd Degree Workplace, to finish harassing and being racial to the Plaintiff after of his termination and abandon penalties. Next, the harassment's came from the store manager name (**Todd MacPherson**) violating Title VII, causing hostilities, from keep hanging up the phone in a important business phone conversation, on data 11/11/2022, then to the next day responding to the Plaintiff saying “ WHO THE FUCK IS YOU”, Which states towards a **identity**, of race, gender, religious, ancestors, and family back-round, of the direct definition of **WHO IS YOU**, then terminated the Plaintiff **directly in the identity question**. Then to the store private (**HR**) name (**Casandra Nitkowski**) misleading the Plaintiff of the state law and company policies, with placing in false documents under the Plaintiff identification which caused the Plaintiff termination, that (**Casandra Nitkowski**) confessed she was dishonest on that placement at the April Lee meeting, with the store union confessing also the Plaintiff done nothing wrong nor inappropriate, then remained the termination of the plaintiff within the racial **standard**. Which by (**Todd MacPherson**) false police report number of # 223160531, it supports wrongful termination and it's a charges as misdemeanor or a felony, and it's consider as obstruction of justice do to dishonesty. The plaintiff was fired because not violating by answering a racial question, and not conducting it's self into the interaction, which the Plaintiff was fired for exercising a legal right duty, protected under Title VII, by maintaining polite and walking away doing rude actions, and reporting hostile work-place environment. The company safety polices was applied for (**Todd MacPherson**) for a false police report and a threat, nothing for Plaintiff.

5. II. “ The Plaintiff Sufficient Facts To State A Visible Claim, of Violations in Baltimore MD”.

6. The defendant allow (**Darian Newman**) to attack and bully and to be racial in the work-place, which is a violation, *see Md Rule's § 3-803*, and *(Title VII of the Civil Right Act of 1964)*, and *42 U.S. Code Section 1981*, taking enjoyment out of life. The defendant acted intentionally do to knowing of the crime and waited for rudeness again.
7. The defendant allowed (**Todd**) to make a false police report, and to ask for a **identity/race** to work with, then employment terminated the Plaintiff directly in the identity question, which is a violation, *see Section 1981*, and *see Title VII*, and *Md Rule's § 3-803*, and *§ 9-501*, taking enjoyment of out life. The defendant was repetitive, they admitted I was wrong treated then held the wrongful terminations.
8. The defendant at the April Lee Grievance meeting, have acknowledgments of the confessions of the wrongful terminations, that was due to a racial act, and still penalize the Plaintiff, which is a violation, *see MD Rule's § 20-606*, *§ 3-803* and *Section 1981*, and *Title VII*, racial taking enjoyment out of life.
9. The defendant allowed (**Casandra Nitkowski**), to retaliate by placing in false files in profiles, and refuse to fix it, within career terminating me, because I placed in a complaint of a racial act, and for participating into a investigation, which is a violation, *see Title VII*, and *42 U.S. Code Section 1981*, of taking enjoyment out of life. Defendant danger a life, which my future from wrongful terminations.
10. The Plaintiff witness is the defendant, of the April Lee meeting, of their prep meeting that made the **announcement's** from the Assistant To The President Of Giant, to express the defendant is guilty and the Plaintiff innocent, which supports its a violation in discrimination, *see Section 1981*, a racial act taking enjoyment. *see MD Rule's § 20-606*, *§ 3-803*, *§ 9-501*. The audio record statements is for proof.
11. The Defendant fail to not be racial/discriminate and violate *Title VII*, and *Section 1981*.

12.

III. Damages

13. The damages the defendant created was lost of tooth from the Assault and Battery, that had to be surgery removed on data 03/23/2023. I lost of career, the union refuse to erase defective fraudulent files, the Plaintiff reputation is damage in the work fields do to back-round checks, the Plaintiff was giving a false police report record, the defendant illegally prevented the Plaintiff from being on the public area, and for jobs in that area, to live civilize, the defendant prevented the Plaintiff from paying bills and made family complications, within harass, race discriminated, and wrongful termination's.

14. Because the Defendant action's were malicious, fraudulent, egregious, and deliberately in bad faith and in total disregard for the rights of the Plaintiff, and towards Civil rights/ Md rules and codes, of breaking the law, within race discrimination, harassment, wrongful terminations, to the Section 1981 and Title VII, the Plaintiff is entitled to an award of punitive damages.

Wherefore The Plaintiff amount sought exceeds more than 75,000,00.

_____.

"Todd MacPherson False Police Report"

_____.

Narrative

Ofc. Whitmore #6462 11/13/2022 1230 hours

On 11/11/2022 at approximately 0630 hours , Ofc. Whitmore was dispatched to the Giant foods located at 10200 Mill Run Cir, Owings Mill, MD 21117 in reference to a threat.

Upon arrival, Ofc. Whitmore met with Complainant Todd MacPherson. Complainant MacPherson Advised that on 11/11/2022 he

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contact one of his employees, Mr. Anthony Wheeler Jr. about him not showing up for work notice. Complainant MacPherson stated Mr. Wheeler said he called, but nobody answered so it wasn't his

problem. Complainant MacPherson told Mr. Wheeler that he still needed to get ahold or show up to notify someone to tell them of his absence. Complainant MacPherson stated Mr. Wheeler became irate and began to insult him. Complainant MacPherson advised he hung up on Mr.

On 11/12/2022 at approximately 0615 hours, Mr. Wheeler entered Complainant MacPherson's office in the back storage area aggressively and stated " Don't hang up motherfucker, I'll kill you, I'll get you outside or in the bathroom.". Complainant MacPherson stated to Mr. Wheeler " Don't you come in here and threaten me". Mr. Wheeler said to the Complainant MacPherson "I'll get you that's a fact". Mr. Wheeler left the store shortly after. Complainant MacPherson advised he is relatively new to the store and has not had issues with Mr. Wheeler prior to this incident. Complainant MacPherson stated Mr. Wheeler is terminated after this incident and wants him trespass. It is unknown if Mr. Wheeler is aware of his termination.

Interviewee Johnny Green advised he has worked with Mr. Wheeler for awhile and he has an abrasive personality. Interviewee Green stated Mr. Wheeler is antagonistic or combative and to deal with him is to not engage with him. Interviewee Green stated Mr. Wheeler has had issues with other employees in the past, but believes he'll never "throw the first punch" so he can play the victim.

Ofc. Whitmore attempted to make contact with Mr. Wheeler with Provided phone numbers, but the number could be disconnected and or not in service. Contact yielded negative results.

Ofc. Whitmore explained protection order procedures and advised if Mr. Wheeler is in area that he can call police.

BWC available

Sgt. J. Fitch #5043 11/15/22 1306

On 11/15/22, this Sergeant reached out to Mr. MacPherson in reference to the above incident. He advised that subject has self terminated by not showing up for any of his shifts, or calling since the incident. Mr. MacPherson Advised that he has not made any threats contacted him or anyone else at the store to his knowledge. Threat Management's information was provided and he was advised to call if anything changed within the situation. No further.

VI.

I. CLAIM FOR RELIEF

42 U.S. Code Section 1981

1. According to Rule 3-305- Claim's For Relief, towards (42 U.S. Code Section 1981), the Plaintiff seek redness and compensation, and hereby incorporates the proceeding and pursuant to Md Rule code and title, Md Rule's § 20-606, and § 5-101, and Section 3-803 harassment, and Section 9-501-

false statements, and 3-503- deductions, and Wrongful Termination, Discrimination, and (Title VII of the Civil Right Act of 1964), and § Section 1981, and in states as follows:

2. On data 06/20/2023 the Plaintiff sign the digital form of the EEOC, of **charge of Discrimination** file on the defendant, and of data 07/05/2023 the Plaintiff was giving a Notice Right To Sue letter from the EEOC, of charge number: **531-2023-01671, which supports the Plaintiff in a protected class, citizen in Unite States Of America, of a Black African American male, under Title VII.**

3. The **(Defendant)**, Giant Of Maryland LLC, which is located at, 8301 Professional Pl #115 Landover. Maryland 20785, it's the Headquarters of the store **Giant, location at 10210 Mill Run Circle, Owings Mills, MD 21117**, where the wrongful terminations by (Todd MacPherson) happen at, from him became furious and anxiously of waiting for a response of a identity/race question, then to job termination of it, and made a dishonest police report, where store union also states the Plaintiff is innocent. Also it's the location where the Assault and Battery happened at within a Race Hate Crime.

4. The Plaintiff worked for Giant for approximately 6 year's, which ended at the job location of 10210 Mill Run Circle, Owings Mills, MD 21117, within the Assault and Battery on data 06/15/2021 around 12:15 am, by **(Darian Newman)** that was punching the Plaintiff while screaming black bitches and niggers, and the company accepting **(Darian Newman)** back in the same store of police report number # 211660079, J9- Assault, 1st/2nd Degree Workplace, to finish harassing and being racial to the Plaintiff after of his termination and abandon penalties. Next, the discrimination came from the store manager name **(Todd MacPherson)** violating Title VII, causing hostilities, from keep hanging up the phone in a important business phone conversation, on data 11/11/2022, then to the next day responding to the Plaintiff saying " WHO THE FUCK IS YOU", Which states towards a **identity**, of race, gender, religious, ancestors, and family back-round, of the direct definition of WHO IS YOU,

then terminated the Plaintiff directly in the identity question. Then to the store union private (**HR**) name (**Casandra Nitkowski**) misleading the Plaintiff of the state law and company policies, with placing in false documents under the Plaintiff identification which caused the Plaintiff termination also, that (**Casandra Nitkowski**) confessed she was dishonest on that placement at the April Lee meeting, with the store union confessing also the Plaintiff done nothing wrong nor inappropriate, just then remained the termination of the plaintiff within the racial standard. Which by (**Todd MacPherson**) false police report number of # 223160531, it supports wrongful termination and it's a charges as misdemeanor or a felony, and it's consider as obstruction of justice do to dishonesty. The plaintiff was fired because not violating by answering a racial question, and not conducting it's self into the interaction, which the Plaintiff was fired for exercising a legal right duty protected under Title VII, by maintaining polite and walking away doing rude actions, and reporting hostile work-place environment. The company safety polices was applied for (Todd MacPherson) for a false police report and a threat, just nothing for Plaintiff. The defendant stopped the promotions of income raises and back-pay from being off doing (**Todd MacPherson**) investigation, the defendant racial acted to prevent enjoyment in life, cause they know I was going have a good time with that money, *see 42 U.S. Code Section 1981*.

5. II. “ The Plaintiff Sufficient Facts To State A Visible Claim, of Violations in Baltimore MD”.

6. The defendant allow (**Darian Newman**) to attack, bully and to be racial in the work-place into I gotten terminated, *see Section 1981*, and *Title VII*, and *U.S.C section 2000e-3*, to deliberately cause harm, knowing working supplies is only razors and pocket knives. It's a violation act in Maryland Law.
7. The defendant accepted (**Todd MacPherson**) to terminate my career do to my identity, then to make a false police report, when both knowing it's false, which makes it illegal, in hostilities, to make career termination's, *see MD Rule's § 20-606*, and *§ 9-501* and *Title VII*, and *Section 1981*, from racial input.

8. The April Lee meeting have acknowledgments of the confessions of the wrongful termination's, do to a racial act, and still penalized the Plaintiff, *see Section 1981*, and Md Rule's (§ 20-606).
9. The (HR) (Casandra), done a retaliation position, because I placed in a complaint of a racial act, within participating in a activity protected under state law of Title VII. *see 42 U.S.C. § 2000e-3(a)*, and *see Md Rule (§ 20-606), (Section 1981), of a racial act taking enjoyment out of life, of job termination*.
10. The Plaintiff witness is the defendant, of the April Lee meeting, of their prep meeting that made the **announcement's** from the Assistant To The President Of Giant, to express the defendant is guilty and the Plaintiff innocent, which supports its a violation in discrimination, *see Section 1981*, a racial act taking enjoyment. *see MD Rule's § 20-606, § 3-803, § 9-501*. The audio record statements is for proof.
11. The Defendant fail to not be racial/discriminate and violate Title VII and Section 1981.
12. III. "The Plaintiff incorporates by references the facts alleged in 42 U.S, Code Section1981, elements, of claim for relief in four counts, as states as follow".
13. Count One
14. A. The conduct was so severe and pervasive that a reasonable employer position would find the plaintiff's work environment to be hostile, abusive and racist.

ANSWER

15. The conduct by the Defendant shows within retaliation in the company, disparate treatment and intentionally discriminated against the Plaintiff, from (Todd MacPherson) being racial for a identity to determine to be appropriate to, and to cooperate with, then (Todd MacPherson) made a false police report of several threat's which is Phone Harassment, that is charges as a misdemeanor or a felony,

and then job terminated the Plaintiff that same day on data 11/12/2022, and done a illegal income deduction. Then the store (HR) supporting the store manager (Todd MacPherson) racial crime, by making a false company report in the Plaintiff name, with terminating the Plaintiff career after the reinstatement from the (HR), then the store union admits the (HR) and the store manager in wrong, then the same store union terminated the plaintiff, within all of the giving top staff in the same race of the store manager (Todd MacPherson) within his racial yells, of the currant union rep is a **white**, the former union rep is a **white**, the union supervisor is a white that was speaking for the store manager that is **white**, that was supporting the former store manager lady that is a **white**, the director of the April Lee Grievance meeting is a **white**, as I'm the only Black, hearing the statements I'm innocent just fired.

16. The store union also accepted a racial former employee that done a Assault and Battery/Race Hate Crime on the Plaintiff, to work in the same store as a vendor as a regular employee, with regular employee authorities next to the Plaintiff/ victim again to stalk, harass, say threats and to be racial, of having the Plaintiff keep watching the surroundings everyday of working 6 days a week, into near 2 years, to prevent from being further harm from our working tools is only **blades/ knives**. The store manager name (Todd MacPherson) gotten excited of the racial verbal abuse, then assisted a racial act.

17. Count two

18. B. The store union was a failure to correct a pre-existing environment's.

ANSWER

19. I reported of the staff acting violently and racial, just my reports wasn't giving any consideration to. I spoken of people actions before I gotten into a Assault and Battery / Race Hate Crime, and I spoken of the guy that done the Assault and Battery name (Darian Newman), is breaking the company law by working back in the store after his crime, and working around me in the same store

being racial and harassing, just my reports wasn't giving any consideration to for me again, when he being **racial creating actions** for people to interact into. I also spoken of the store (HR) is in retaliation for placing in a complaint on a racial matter, just still I gotten terminated without a giving investigation, and in from her authorities within the store union. I even repeatedly spoken of the store manager (Todd MacPherson) was in a racial act, just the store union supported him while **stating and expressing to me I'm the only one innocent**, then the defendant keep the racial and penalize me the innocent one, within I'm the only different race in their meeting, as theirs all the same, **of holder's of final decision**.

20. Count three

21. C. The right to be free from racial discrimination was violated.

ANSWER

22. I was racial profile, then gotten into a **Assault and Battery /Race Hate Crime** action within it, from the man name (Darian Newman), and the store still kept him around me, with intent to do harm, because they know of the serious/ crime. Also the store (HR) racist acted by supporting the racial store manager racial act. The store union understood the store manager was in a racial act, and the store union still penalize me within all of the racial acts, of the store (HR), and the store manager, and the former employee of the **Assault and Battery**. **The corporation intentionally cause an infringement of rights protected by Section 1981, and by not reinstating me back with the employment. I the Plaintiff was subjected to harassment by the defendant and that this harassment was motivated by my race,** from the **Assault and Battery/ Race Hate Crime**, to the store manager racial act asking for a identity/ race to work with, and to keep a career then job terminated me, to the store (HR) supporting a racial act then terminated me, to the store union at the April Lee Grievance meeting, that held all positions accountable of being wrong doing, and then the store union done a racial act their-self

of company holders, by supporting all, and remaining my career termination. I was working in good faith when the defendant staff violation had occurred, and within a racial act, also the **Assistant To The President Of Giant** admitted they in wrong, with saying I'm very respectful, that also means only my race is the mean factor, of why I'm not reinstated, of what only all of the arguments was about, which violates **Title VII. The defendant intended to discriminate on the basis of race. see Section 1981.**

23. Count four

24. D. **The alleged retaliatory activity was serious enough that it well might have discouraged a reasonable worker from my protected activity.**

ANSWER

25. As the Plaintiff being respectful to hire, it'll will still be complicated do to because companies want to know what type of career once was going on, and why of leaving, and they do back-round checks their-self, **especially to work for the state**, and all I have is defective fraudulent files and within a false police report, and the defendant don't want to correct the files after confessing I'm innocent, **after admitting they in wrong**, it's because I'm black against a white racial action, **that they know they in wrong of**, also with having more strength than me in their company to change anything, which meant to harm my present and future positions in life. The Defendant harm to the Plaintiff, also comes from the **Assault and Battery/Race Hate Crime**, by (Darian Newman) in the store of Giant, from making **complicated interference, conditions, to press charges** if I decided, which is all directly in **Section 1981** violation of "supporting (Darian) in his racial and illegal actions, to be a discouraged.

26.

IV. Damages

27. I was trying avoid harm, defendant created lost of tooth from the Assault and Battery, that had

to be surgery removed on data 03/23/2023. Tangible harm also, I lost of career, the union refuse to fix defective fraudulent files. Plaintiff reputation is damage in the work fields do to back-round checks, the Plaintiff was giving a false police report record, the defendant illegally prevented the Plaintiff from being on the public area, and for jobs in that area, to live civilize, the defendant prevented the Plaintiff from paying bills and made family complications, from the race discrimination, wrongful termination's.

28. Because the Defendant action's were malicious, fraudulent, egregious, and deliberately in bad faith and in total disregard for the rights of the Plaintiff, and towards Civil rights/ Md rules and codes, of breaking the law, within intentional discrimination (Race), harassment's, wrongful termination's, to the **Section 1981**, and **Title VII**, the Plaintiff is entitled to an award of punitive damages.

Wherefore The Plaintiff amount sought exceeds more than 75,000,00.

_____.

"Todd MacPherson False Police Report"

Narrative

Ofc. Whitmore #6462 11/13/2022 1230 hours

On 11/11/2022 at approximately 0630 hours , Ofc. Whitmore was dispatched to the Giant foods located at 10200 Mill Run Cir, Owings Mill, MD 21117 in reference to a threat.

Upon arrival, Ofc. Whitmore met with Complainant Todd MacPherson. Complainant MacPherson Advised that on 11/11/2022 he

contact one of his employees, Mr. Anthony Wheeler Jr. about him not showing up for work notice. Complainant MacPherson stated Mr. Wheeler said he called, but nobody answered so it wasn't his problem. Complainant MacPherson told Mr. Wheeler that he still needed to get ahold or show up to notify someone to tell them of his absence. Complaint MacPherson stated Mr. Wheeler became irate and began to insult him. Complainant MacPherson advised he hung up on Mr.

On 11/12/2022 at approximately 0615 hours, Mr. Wheeler entered Complainant MacPherson's office

in the back storage area aggressively and stated " Don't hang up motherfucker, I'll kill you, I'll get you outside or in the bathroom.". Complainant MacPherson stated to Mr. Wheeler " Don't you come in here and threaten me". Mr. Wheeler said to the Complainant MacPherson "I'll get you that's a fact".

Mr. Wheeler left the store shortly after. Complainant MacPherson advised he is relatively new to the store and has not had issues with Mr. Wheeler prior to this incident. Complainant MacPherson stated Mr. Wheeler is terminated after this incident and wants him trespasses. It is unknow if Mr. Wheeler is aware of his termination.

Interviewee Johnny Green advised he has worked with Mr. Wheeler for awhile and he has an abrasive personality. Interviewee Green stated Mr. Wheeler is antagonistic or combative and to deal with him is to not engage with him. Interviewee Green stated Mr. Wheeler has had issues with other employees in the past, but believes he'll never "throw the first punch" so he can play the victim.

Ofc. Whitmore attempted to make contact with Mr. Wheeler with Provided phone numbers, but the number could be disconnected and or not in service. Contact yielded negative results.

Ofc. Whitmore explained protection order procedures and advised if Mr. Wheeler is in area that he can call police.

BWC available

Sgt. J. Fitch #5043 11/15/22 1306

On 11/15/22, this Sergeant reached out to Mr. MacPherson in reference to the above incident. He advised that subject has self terminated by not showing up for any of his shifts, or calling since the incident. Mr. MacPherson Advised that he has not made any threats contacted him or anyone else at the store to his knowledge. Threat Management's information was provided and he was advised to call if anything changed within the situation. No further.

VII.

I. CLAIM FOR RELIEF

Notice Right To Sue / Charge Of Discrimination

Title VII of the Civil Right Act of 1964

1. According to Rule 3-305- Claim's For Relief, towards Notice Right To Sue/ Charge Of Discrimination, within (Title VII of the Civil Right Act of 1964), §1601.28, the Plaintiff hereby incorporates the proceeding and pursuant to Md Rule code and title, Md Rule's § 20-606, and Md. Code Ann., Cts & Jud. Proc. § 5-101, and Section 3-803 harassment, and Section 9-501- false

statements, and 3-503- deductions, and (42 U.S. Code Section 1981), and Discrimination's, and Wrongful Termination's and seek redness and compensation, as states as follows:

2. On data 06/20/2023 the Plaintiff sign the digital form of the EEOC, of **charge of Discrimination** file on the defendant, and of data 07/05/2023 the Plaintiff was giving a Notice Right To Sue letter from **the EEOC**, of charge number: **531-2023-01671**, assigned towards the defendant, which supports the Plaintiff in a protected class, and in being a Black African American male.

3. The Plaintiff worked for Giant for approximately 6 year's, which ended at the job location of 10210 Mill Run Circle, Owings Mills, MD 21117, within the Assault and Battery on data 06/15/2021 around **12:15 am**, by (**Darian Newman**), and also from (**Todd MacPherson**) that racial act yelling for a **identity** to keep a career, to straight termination after the identity question, on data 11/12/2022. Also this case within the **Store (HR)** placed in a false complaint, for engaging into a protected activity within Title VII, of reporting violations in the company, of a dangerous working environment, in hostilities, then the store union confess their staff are guilty to the Plaintiff, then terminated Plaintiff.

4. **II. The Plaintiff states the Discrimination complaint from the (EEOC) for (NRTS).**

5. I, Anthony Quinn Wheeler jr. submits this complaint against Giant Of Maryland LLC. for Discrimination, Harassment, Wrongful Termination and pursuant to Maryland Rule and title of, Title VII, and {42 U.S. Code Section 1981} and { 20-606. Unlawful employment practices}, and { Section 3-803- harassment }, and { Section 9-501- false statements}, and (3-503. Deductions.), and in support thereof, states as follows: 1. The store manager Todd MacPherson at store located at 10210 Mill Run Circle, Owings Mills, MD 21117, placed in annoying scenery on the phone on data 11/11/2022, by trying make a conversation turn to a argument, by yelling threatening my job and by keep hanging up the phone, while I was talking, which left me confuse of still having a job, of Todd MacPherson motive. Just I spoken to a other manager later that day, and giving my schedule, and was suppose to be receive my 5 (PH) hours, which I didn't see it to weeks later with making a lower amount stating 13.50, when I was currant making 14.50 a hour. 2. The store manager Todd MacPherson placed in a harassment position, by making a annoying hostility scenery, in his office the next day on data 11/12/2022, when racial profiling me towards giving respect to, by Todd yelling 'Who the fuck are you,

coming in my office tell me what to do', when I was asking for respect. Then Todd made a false police report, of several threats, and terminated me that same day of data 11/12/2022. Which at a April Lee grievances meeting near a half of year later, on data 02/28/2023 the Union supported me, by stating I done nothing inappropriate, of the threats Todd stated. The police report number of # 22-316-0531 3. The private (HR) name Casandra Nitkowski, placed in a annoying retaliation /reprisal position, and a discriminating act, to prevent me from placing in a complaint, and for placing in a complaint. The annoying scenery Casandra done was by trying misled me of the state law, of saying phone harassment legal. Casandra also placed in a dishonest reports in my records saying I was threatening her life, which at the April Lee grievance meeting on data 02/28/2023 near a half of a year later, Casandra confessed our conversation wasn't how she stated, which supporting I was wrongful Terminated by her. 4. At the April Lee meeting on data 02/28/2023 near a half of year later from the crime of Todd, the union admitted I done nothing wrong, just still Todd MacPherson racial act of terminating me remained, that the Union said he wrongful created. The union knows Todd was in a racial act, just still I gets penalize. 5. The store done a harassment within a discrimination act, cause a abandoned worker was allow to re-enter and work in the store, after doing a assault and battery crime on me in the store, and after screaming racially words of bitches and niggers, and screaming threats. The company allow him to stalk, and violate the company rules that made hostility to the day I gotten terminated, the store made a dangerous working environment from the assault, of police report number of # 21-166-0079 Therefor I'm requesting towards a verification to place in a disciplinary action and a complaint.

6. III. The Plaintiff States A Visible Claim, in Title VII of the Civil Right Act of 1964, elements.

7. The adverse employment action I suffer was career termination, for participating in a activity protected under state law of Title VII, towards discrimination, harassment, and wrongful termination. I was subjected to the adverse, because of reporting I got fired directly in a identity question, before I said anything, and of a false (HR) and police report, and in Race Hate Crime hostilities. *see (A,B,C,D)*

A. Race Discrimination

8. The defendant accepted a former employee that done a Assault and Battery /Race Hate crime on the Plaintiff, to re-enter the company after his abandoned penalty, to stalk, harass and to be racial, causing hostilities into the Plaintiff gotten wrongful terminated there. The defendant (**Todd MacPherson**) judged the Plaintiff **identity**, in-order to be cooperative with, and to keep a career, which when he terminated Plaintiff and made a false police report, to play with the Plaintiff identity of race

description, for his own entertainment. Then the defendant (HR) hire the Plaintiff back with the job then fired the Plaintiff, doing when she made a false disciplinary report, to support the racial act of (Todd MacPherson). The defendant store union admits (Todd MacPherson) and the store (HR) is guilty, just still remained the wrongful termination's of the Plaintiff career, that is within violations under Title VII protected class activities, which is no discrimination's, or hostile working environment.

B. Employer retaliation

9. The retaliations occurred in the situation of being job terminated, for placing in a complaint on the former store employee and managers, which led to (Todd MacPherson), (Casandra Nitkowski) and the store union racial motive to career termination, under a protected class activities under Title VII, which is not to discriminate towards the innocent to profit the guilty, and for placing in a complaint. Which do to the Plaintiff placing in complaint, and do the Plaintiff race it's what made a permanent career termination. The defendant towards the April Lee Grievance was in retaliation, by repeatedly getting in contact with me with no desire of reinstatement, do to placing a complaint to follow up on.

C. Hostile work environment

10. The defendant created a hostile working environment when accepting a former employee that done a Assault and Battery, to work right next to the Plaintiff to stalk, harass, be racial and to cause hostility in the company, and when he is abandoned. Also (Todd MacPherson), and (Casandra Nitkowski) caused a hostile work environment by making up false criminal reports to terminated the Plaintiff, which violates under Title VII and Section 1981, do to it's involve in a identity/race dispute directly.

D. Constructive discharge

11. The defendant made working conditions so intolerable that a reasonable person would have felt compelled to resign, by the defendant accepting a former employee that done a Assault and Battery

crime to work right back in the same store next to victim, straight after he just gotten terminated and abandoned, to stalk, harass, and to be racial, when our working supplies we permanently have on us is **knives** and cutters **blades**. Then defendant accepted a store manager to make a false police report to the store for his own entertainment, to **arrest** the Plaintiff do to a race/identity, context capacity question.

12. IV. “ The Plaintiff Sufficient Facts To State A Visible Claim, of Violations in Baltimore MD”.

13. The defendant allow (**Darian**) to attack and bully and to be racial in the work-place, even after their self knowledge from audio and video footage, showing within car racking threats, of trying destroy the Plaintiff car in their empty store parking-lot, and with using profanity with racial terms. Then the defendant accepted (**Darian**) to work shoulder to shoulder to the Plaintiff again while (**Darian**) abandoned from the property, within police report number # 211660079, J9- Assault, 1st/2nd Degree Workplace, that made hostilities into the Plaintiff gotten terminated. *see Section 1981 and Title VII, that led to employment Termination's. The defendant endangered the Plaintiff life, by their neglects in the safety and health, its a violation on allowing a racial act take enjoyment of life, see Section 1981*

14. The defendant allowed (**Todd**) to make a false police report, and to ask for a **identity**/race to keep a career, then terminated the Plaintiff directly in the identity question, which is a violation, *see 42 U.S. Code Section 1981, and see Title VII, and Md Rule's § 3-803, and § 9-501, taking enjoyment of out life.*

15. The defendant at the April Lee Grievance meeting have acknowledgments of the confessions of the wrongful termination, that was do to a racial act, and still penalize the Plaintiff, which is a violation, *see MD Rule's § 20-606, § 3-803, 42 U.S. Code Section 1981, and Title VII.* The disputes came from the a matter of my identity/ race and within, that created all interactions of rude behavior actions.

16. The store union (**HR**) (**Casandra Nitkowski**) done a retaliation/reprisal position, because I placed

in a complaint, and participating into a investigation, *see Title VII of the Civil Right Act of 1964*, and *42 U.S.C § 2000E-3*, and for assisting a racial act of (**Todd**) that terminate me, *see Section 1981*.

17. The Plaintiff witness is the defendant, of the April Lee meeting, of their prep meeting that made the **announcement's** from the Assistant To The President Of Giant, to express the defendant is guilty and the Plaintiff innocent, which supports its a violation in discrimination, *see Section 1981*, a racial act taking enjoyment. *see MD Rule's § 20-606, § 3-803, § 9-501*. The audio record statements is for proof.

18. The Defendant fail to not be racial/discriminate and violate *Title VII*, and *Section 1981*.

19.

V. Damages

20. The damages the defendant created was lost of tooth from the Assault and Battery, that had to be surgery removed on data 03/23/2023. I lost of career, the union refuse to erase defective fraudulent files, the Plaintiff reputation is damage in the work fields do to back-round checks, the Plaintiff was giving a false police report record, the defendant illegally prevented the Plaintiff from being on the public area, and for jobs in that area, to live civilize, the defendant prevented the Plaintiff from paying bills and **made life complications, within harass, race discrimination, and wrongful termination's**.

21. Because the Defendant action's were malicious, fraudulent, egregious, and deliberately in bad faith and in total disregard for the rights of the Plaintiff, and towards Civil rights/ Md rules and codes, of breaking the law, within race discrimination, harassment, wrongful terminations, to the **Section 1981** and **Title VII**, the Plaintiff is entitled to an award of punitive damages.

Wherefore The Plaintiff amount sought exceeds more than 75,000,00.

"Todd MacPherson False Police Report"

Narrative

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contact one of his employees, Mr. Anthony Wheeler Jr. about him not showing up for work notice. Complainant MacPherson stated Mr. Wheeler said he called, but nobody answered so it wasn't his problem. Complainant MacPherson told Mr. Wheeler that he still needed to get ahold or show up to notify someone to tell them of his absence. Complaint MacPherson stated Mr. Wheeler became irate and began to insult him. Complainant MacPherson advised he hung up on Mr.

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Ofc. Whitmore explained protection order procedures and advised if Mr. Wheeler is in area that he can call police.

BWC available

Sgt. J. #5043 11/15/22 1306

On 11/15/22, this Sergeant reached out to Mr. MacPherson in reference to the above incident. He advised that subject has self terminated by not showing up for any of his shifts, or calling since the incident. Mr. MacPherson Advised that he has not made any threats contacted him or anyone else at the store to his knowledge. Threat Management's information was provided and he was advised to call if anything changed within the situation. No further

VIII.

I. CLAIM FOR RELIEF

PUNITIVE Damages

1. **According to** Rule 3-305- Claim's For Relief, in Punitive Damages, and pursuant to Employment Discrimination's (Race), Harassment's and Wrongful Termination's, within Section 1981, and Title VII.
2. Because the Defendant action's were malicious, fraudulent, egregious, in bad faith and in total disregard for the rights of the Plaintiff, and towards Civil rights/ Md rules of breaking the law, within assisting a Assault and Battery/ Race hate, then fired do to a **identity**, and to assisting a racial act from within all, from the store (HR) and their union, the Plaintiff is entitled to an award of punitive damages.

3. **II. Damages**

4. The damages the defendant created was lost of tooth from the Assault and Battery, that had to be surgery removed on data 03/23/2023. I lost of career, the union refuse to erase defective fraudulent files, the Plaintiff reputation is damage in the work fields do to back-round checks, the Plaintiff was giving a false police report record, the defendant illegally prevented the Plaintiff from being on the public area, and for jobs in that area, to live civilize, the defendant prevented the Plaintiff from paying bills and made life complications, within harass, race discrimination, and wrongful termination's, with evil motive, intent to injure, therefore the Plaintiff is entitled to all damages allowed thereof to include:

A. Discrimination: 10,000,000

B. Wrongful Terminated: 10,000,000

C. Harassment: 100,000

D. 42 U.S. Code Section 1981: 429,600,000

E. Title VII, EEOC Charge Of Discrimination / Notice Right To Sue: 300,000

IX.

I. PRAYER FOR RELIEF

1. According to Rule 3-305- Claims for Relief, and WHEREFORE, Plaintiff respectfully prays this court for judgment, and for punitive damages as follows:
2. Do to the Defendant outrages rude disrespect to the business, and to the business safety Policies, State Laws, also to (42 U.S. Code Section 1981) and (Title VII of the Civil Right Act of 1964), from their Employment Discrimination's (Race), Harassment's, and Wrongful Termination's, the Plaintiff therefore are entitle into compensation. Therefore the Plaintiff Order's of:
3. That the court enter judgment against the Defendant for a sum in excess of (two hundred and fifty million) 250,000,000.00 over to the Plaintiff.
4. For the foregoing reasons, (Plaintiff), Anthony Quinn Wheeler jr, (Pro Se), respectfully request that this court enter a Order granting PRAYER FOR RELIEF, for the sums of 250,000,000.00 dollars.

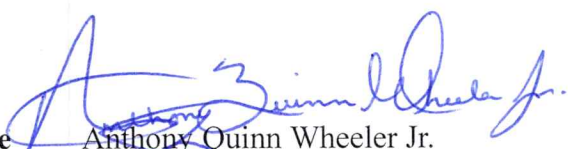
5. Jury Demand

The Plaintiff, Anthony Quinn Wheeler jr. Pro Se, Respectfully requests that any and all issues in this case be tried by jury, and request all other relief just and proper in the premise.

Respectfully submitted this 25th day of September, 2023

6. I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

Pro Se


Anthony Quinn Wheeler Jr.
1919 Winder Rd
Baltimore MD 21244

Email : Anthony77Wheeler@gmail.com

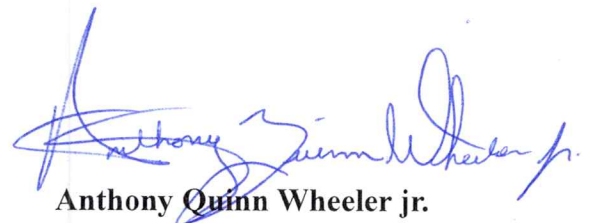
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of September, 2023, two (2) copies of the Plaintiff amended complaint were, certified first-class mail to the Defendant attorney:

SEYFARTH SHAW LLP
975 F Street, NW
Washington, DC 20004

defendant attorney

Pro Se



Anthony Quinn Wheeler jr.